

**IN THE UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

**IDS PROPERTY CASUALTY  
INSURANCE COMPANY**

**PLAINTIFF/COUNTER-DEFENDANT**

**VS.**

**CIVIL ACTION NO. 3:09CV697-HTW-LRA**

**CARRIE MEEKS AND  
MISSISSIPPI FARM BUREAU CASUALTY  
INSURANCE COMPANY**

**DEFENDANTS**

---

**MISSISSIPPI FARM BUREAU CASUALTY  
INSURANCE COMPANY**

**DEFENDANT/COUNTER/CROSS-PLAINTIFF**

**VS.**

**CARRIE MEEKS**

**CROSS-DEFENDANT**

---

**MISSISSIPPI FARM BUREAU CASUALTY  
INSURANCE COMPANY**

**DEFENDANT/COUNTER/CROSS-PLAINTIFF**

**VS.**

**IDS PROPERTY CASUALTY  
INSURANCE COMPANY**

**COUNTER-DEFENDANT**

**MOTION TO RESET SCHEDULING ORDER DEADLINES**

COMES NOW the Defendant, Carrie Meeks, by and through counsel and files this her motion to reset deadlines of scheduling order and Defendant would state as follows:

1. The cause of action for declaratory judgment was filed on November 19, 2009.
2. Defendant hired new counsel just before the March 1, 2011, status conference during which the parties appeared by telephoned to discuss the various aspects of the case.
3. On or about March 1, 2011, the Court reset the scheduling order deadlines as

follows:

- a) Experts Plaintiff Deadline due by April 1, 2011;
  - b) Experts for Defendant Deadline due by May 2, 2011;
  - c) Discovery due by July 1, 2011;
  - d) Motions due by July 15, 2011;
  - e) Pretrial Conference set for October 7, 2011; and
  - f) Jury Trial set for November 14, 2011
4. Defendant has reviewed the engineering, contractors, and other reports involved in this matter. Defendant, additionally, has consulted with other experts in order to fully evaluate all claims and defenses of the Defendant. While Defendant has had some difficulty in preparing her damage claims, she has been diligent in evaluating such. In fact, Defendant recently received a mold report from Troublshooters, Inc., a copy of which has been provided to opposing counsel.
5. In light of the newly attained report, Defendant requests that the discovery, expert designation, and motion deadlines be reset for an additional ninety (90) days in order that both parties may properly complete discovery. By resetting said deadlines, the trial and remaining dates need not be reset and no prejudice will result to the remaining parties.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that the Court will grant Defendant's motion to reset the expert designation and discovery deadlines.

RESPECTFULLY SUBMITTED, this the 12<sup>th</sup> day of July, 2011.

/s/ Sanford E. Knott, Esquire  
SANFORD E. KNOTT, MSB #8477  
ATTORNEY FOR PLAINTIFF

OF COUNSEL:

SANFORD KNOTT & ASSOCIATES, P.A.

POST OFFICE BOX 1208

JACKSON, MISSISSIPPI 39215-1208

TELEPHONE NUMBER: (601) 355-2000

FACSIMILE NUMBER: (601) 355-2600

**CERTIFICATE OF SERVICE**

I, Sanford E. Knott, attorney for Defendant Carrie Meeks, do hereby certify that I have on this date electronically filed via, the Electronic Case Filing system, with the Clerk of the Court a true and correct copy of the foregoing document and an e-mailed copy sent to the following:

Rhonda Lea McCullough, Esq.  
Copeland, Cook, Taylor & Bush, P.A.  
P.O Box 6020  
Ridgeland, MS 39158

Arnold U. Luciano, Esquire  
JACKS, ADAMS & NORQUIST, P.A.  
Post Office Box 1209  
Cleveland, Mississippi 38732

This the 12<sup>th</sup> day of July, 2011.

/s/ Sanford E. Knott, Esquire  
Sanford E. Knott, Esquire